UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	V
ARNOLD SCHANFIELD, individually and on behalf of others similarly situated,	-X : : : No. 07 Civ. 9716 (CM) (JCF)
Plaintiff,	:
- against -	: :
SOJITZ CORPORATION OF AMERICA; JUN MATSUMOTO in his official and individual capacities; and TAKASHI TSUKADA in his official and individual capacities,	: PLAINTIFF SCHANFIELD'S : PROPOSED VERDICT SHEET :
Defendants.	:
	: -X

Plaintiff Arnold Schanfield, by and through his attorneys, Thompson Wigdor & Gilly LLP, hereby proposes that the following verdict sheet be used in the trial of this matter.

Dated: New York, New York January 30, 2009

Respectfully Submitted,

THOMPSON WIGDOR GILLY, LLP

By:

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Counsel for Arnold Schanfield/ Proposed Class Counsel

COLLEEN MCMAHON, District Judge:

According to the principles of law as charged by the Court and the facts as you find them from a preponderance of the evidence, please answer the following questions:

On Plaintiff Arnold Schanfield's claim of race/national origin discrimination, we the jury

SECTION 1: Race/National Origin Discrimination

find: Sojitz Corporation of America Liable _____ Not Liable _____ Jun Matsumoto Liable _____ Not Liable _____ Takashi Tsukada Not Liable ____ Liable IIf you have found liability on any one or more of the claims above, fill in the appropriate space(s) below. Otherwise, skip this section and proceed to the next section.] The economic damages, if any, due to Plaintiff Arnold Schanfield are: The compensatory damages, if any, due to Plaintiff Arnold Schanfield are: \$_____ The nominal damages, if any, due to Plaintiff Arnold Schanfield are: \$____ Plaintiff Arnold Schanfield is entitled to punitive damages for his race/national origin discrimination claim: YES _____ NO

SECTION 2: Retaliation

On Plaintiff Arnold Schanfield's claim of retaliation, we the jury find:		
Sojitz Corporation of America		
Liable	Not Liable	
Jun Matsumoto		
Liable	Not Liable	
Takashi Tsukada		
Liable	Not Liable	
[If you have found liability on any one or more of the claims above, fill in the appropriate space(s) below. Otherwise, skip this section and proceed to the next section.]		
The economic damages, if any, due to Plaintiff Arnold Schanfield are:		
\$		
The compensatory damages, if any, due to Plaintiff Arnold Schanfield are:		
\$		
The nominal damages, if any, due to Plaintiff Arnold Schanfield are:		
\$	_	
Plaintiff Arnold Schanfield is entitled to punitive damages for his retaliation claim:		
YES	NO	

SECTION 3: Aiding and Abetting

On Plaintiff Arnold Schanfie	eld's claim of aiding and abetting, we the jury find:
Jun Matsumoto	
Liable	Not Liable
Takashi Tsukada	
Liable	Not Liable
	on any one or more of the claims above, fill in the Otherwise, skip this section and proceed to the next section.]
The economic damages, if ar	ny, due to Plaintiff Arnold Schanfield are:
\$	
The compensatory damages,	if any, due to Plaintiff Arnold Schanfield are:
\$	
The nominal damages, if any	, due to Plaintiff Arnold Schanfield are:
\$	
Plaintiff Arnold Schanfield is abetting:	s entitled to punitive damages for his claim of aiding and
YES	NO

SECTION 5: Liability for Class Race/National Origin Discrimination

On the Class claims of race/national	origin discrimination, we the jury find:
Sojitz Corporation of America	
Liable	Not Liable

SECTION 6: Damages for Class Race/National Origin Discrimination

If you have found liability on any one or more of the claims in **Section 5**, fill in the appropriate space(s) below. Otherwise, skip this section.

The economic damages, if any, due to the Cla	ss Members are:
\$	
The compensatory damages, if any, due to the	Class Members are:
\$	
The nominal damages, if any, due to the Class	Members are:
\$	
The Class Members are entitled to punitive da discrimination claims:	mages for their race/national origin
YES	NO

FINAL INSTRUCTIONS: ONCE YOU HAVE COMPLETED THIS FORM, THE JURY'S FOREPERSON SHOULD SIGN AND DATE IT.

THEN ADVISE THE COURT BY NOTE THAT YOU HAVE REACHED A VERDICT AND THAT YOU ARE READY TO RETURN TO THE COURTROOM TO ANNOUNCE YOUR VERDICT.

Dated:	New York, New York		
	(1)	, 2009	
	(date)		
			FOREPERSON